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UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re:	:	Chapter 11
	:	
LEHMAN BROTHERS HOLDINGS, INC.,	:	Case No. 08-13555 (JMP)
<i>et al.</i> ,	:	
	:	
Debtors	:	(Jointly Administered)
	X	

**OBJECTION OF ROGGE GLOBAL PARTNERS PLC TO THE  
DEBTORS' MOTION TO RENEW MOTION TO ALLOW  
DISCLOSURE OF THE DERIVATIVE QUESTIONNAIRES**

Rogge Global Partners PLC (“Rogge”) on behalf of itself and its present or former clients (collectively, the “Rogge Clients”), including the entities identified on Exhibit A hereto, that have submitted Derivative Questionnaires<sup>1</sup> and/or guarantee questionnaires (collectively, the “Questionnaires”) in these chapter 11 cases, by and through its undersigned counsel, hereby renews its objection (styled previously as a joinder in the Objection of Creditors [ECF Docket No. 49132] (the “Creditor Objection”)) to the Debtors’ Motion to Renew Motion to Allow Disclosure of the Derivative Questionnaires Pursuant to Section 107(a) of the Bankruptcy Code [ECF Docket No. 51312] (the “Motion”) as follows:

1. Pursuant to the Bar Date Order, Rogge submitted Questionnaires in connection with the proofs of claim it had filed on behalf of the Rogge Clients. The Questionnaires included

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<sup>1</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Motion.

confidential and proprietary information that Rogge understood would be accessible only to the Debtors, the Creditors' Committee and their respective advisors and counsel. Indeed, the Bar Date Order expressly limited access to the Questionnaires:

[T]he information submitted on the website <http://www.lehman-claims.com> in respect of Derivative Contracts and Guarantees will not be accessible on the website other than by the party that submitted such information, the Debtors, the Creditors' Committee and their respective advisors and counsel.

See Bar Date Order at p. 9, ECF Docket No. 4271.

2. Because the information provided by Rogge and the Rogge Clients in the Questionnaire remains confidential and proprietary, Rogge objects to the Motion and, to the extent applicable to Rogge and the Rogge Clients, Rogge hereby adopts and incorporates by reference the arguments set forth in the Creditor Objection and in the *Objection of Mitsubishi UFJ Securities International PLC to Debtors' Motion to Renew Motion to Allow Disclosure of the Derivative Questionnaires Pursuant to Sections 107(a) of the Bankruptcy Code* [ECF Docket No. 51368].

WHEREFORE, for the foregoing reasons, Rogge respectfully requests that this Court: (i) deny the Motion; (ii) alternatively, if the Court grants the Motion, direct Debtors to redact all identifying, confidential and proprietary information from any documents disclosed; and (iii) grant such other or further relief as may be appropriate under the circumstances.

Dated: November 6, 2015

/s/ Gregory O. Kaden  
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**EXHIBIT A**

**Saudi Arabian Monetary Agency**  
**ABN AMRO Bank NV (Stichting Pensioenfonds van de)**  
**BAA Pension Trust Company Ltd.**  
**Boehringer Ingelheim**  
**Stichting Pensionfonds Apothekers**  
**Stichting Pensionfonds ENCI**  
**Reid Street Retirement Global Bond Fund**  
**Singapore Press Holdings**  
**Sutter Health- Eden Account**  
**Woo Hay Tong Investments Ltd.**  
**Trafalgar House**

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UNITED STATES BANKRUPTCY COURT  
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: Case No. 08-13555 (JMP)  
LEHMAN BROTHERS HOLDINGS, INC., :  
*et al.*, :  
Debtors : (Jointly Administered)  
-----X

**CERTIFICATE OF SERVICE**

I, Gregory O. Kaden, hereby certify that on the 6<sup>th</sup> day of November, 2015, I caused to be served a copy of the *Renewed Joinder of Rogge Global Partners PLC with Objection of Creditors to Debtors' Motion to Renew Motion to Allow Disclosure of the Derivative Questionnaires* via the Court's CM/ECF system on the attached service list.

Dated: November 6, 2015

/s/ Gregory O. Kaden  
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